

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

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In re:

Chapter 7  
Bky. No. 24-30167

Pro-Mark Services, Inc.,

Debtor.

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Erik A. Ahlgren, as Chapter 7 Trustee of  
Bankruptcy Estate of Pro-Mark Services, Inc.,  
as Administrator of the Pro-Mark Services,  
Inc. Employee Stock Ownership Plan, and as  
Trustee of the Pro-Mark Services, Inc.  
Employee Stock Ownership Trust,

Adv. No. 24-07014

Plaintiff,

**NOTICE OF APPEARANCE &  
REQUEST FOR NOTICE**

v.

Connie Berg, Kyle Berg, Connie Berg  
Revocable Living Trust, Kyle R. Berg  
Revocable Living Trust, Chad DuBois,  
Mandy Grant, and Miguel Paredes,

Defendants.

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**PLEASE TAKE NOTICE** that, pursuant to Bankruptcy Rule 9010(b), Michael B. Fisco, of the law firm of Greenberg Traurig, LLP hereby appears in the above-captioned bankruptcy case as counsel for Erik A. Ahlgren, as Chapter 7 Trustee of Bankruptcy Estate of Pro-Mark Services, Inc., and as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust, and requests that copies of all notices and pleadings given or filed in this case be given and served upon the undersigned at the contact information below.

Michael B. Fisco  
Greenberg Traurig, LLP  
90 South 7th Street, Suite 3500  
Minneapolis, MN 55402  
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Email: [fiscom@gtlaw.com](mailto:fiscom@gtlaw.com)

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced cases and all proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit is intended to waive (i) any right to have final orders in non-core matters entered only after de novo review by a district court judge; (ii) any right to trial by jury in any proceeding so triable herein, or in any case, controversy or proceeding related hereto; (iii) any right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, set-offs or recoupments, in law or in equity, all of which rights, claims, actions, defenses, set-offs and recoupments are expressly reserved.

Dated: October 2, 2024

*/s/ Michael B. Fisco*

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Michael B. Fisco (Minnesota #0175341)

*(Admitted Pro Hac Vice)*

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*and*

Erik A. Ahlgren (North Dakota #09561)

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*Counsel for Erik A. Ahlgren, as Chapter 7 Trustee of Bankruptcy Estate of Pro-Mark Services, Inc., and as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 2, 2024, I electronically filed the foregoing **Notice of Appearance & Request for Notice** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record.

/e/ Michael B. Fisco

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